

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

MARK ANTHONY ORTEGA
Plaintiff,

v.

DANIEL GILBERT FIELDS
and ERIC DOE,
Defendants.

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Case No. 24-CV-0440-OLG-HJB

PROPOSED SCHEDULING ORDER

The disposition of this case will be controlled by the following schedule:

1. The parties must make initial disclosures as required by Federal Rule of Civil Procedure 26(a)(1). To the extent a defendant knows the identity of a responsible third party contemplated by Texas Civil Practices & Remedies Code § 33.004, such identity is subject to disclosure under Rule 26(a)(1)(A)(i).

2. On or before **May 30, 2025**, the parties must submit a Joint Report indicating their agreement regarding a method of ADR, an ADR provider, the method of compensating the provider, and a date for completing the ADR proceeding no later than the date set out in Paragraph 8 below. See Local Rule CV88(a).

3. The parties asserting claims for relief shall submit a written offer of settlement to opposing parties on or before **March 31, 2025**, and each opposing party shall respond, in writing, by **April 21, 2025**.

4. On or before **April 30, 2025**, the parties must file any motion seeking leave to amend or join parties. To the extent it may apply in this case, the deadline for Defendant(s) to file a motion to designate responsible third parties, pursuant to Texas Civil Practices & Remedies Code § 33.004(a), is **April 30, 2025**.

5. All parties asserting claims for relief shall file their designation of testifying experts and shall serve on all parties, but not file, the materials required by Fed. R. Civ. P. 26 by **July 31, 2025**.

6. All Parties resisting claims for relief shall file their designation of testifying experts and shall serve on all parties, but not file, the materials required by Fed. R. Civ. P. 26 by **August 28, 2025**. All designations of rebuttal experts shall be designated within 14 days of receipt of the report of the opposing expert.

7. The parties shall complete all discovery on or before **October 31, 2025**. Counsel may by agreement continue discovery beyond the deadline, but there will be no intervention by the Court except in extraordinary circumstances.

8. The parties must complete mediation or other ADR in this case on or before **November 30, 2025**.

9. An objection to the reliability of an expert's proposed testimony under Federal Rule of Evidence 702 shall be made by motion, specifically stating the basis for the objection and identifying the objectionable testimony by **November 30, 2025**.

10. On or before **December 12, 2025**, parties must file any dispositive motions, including motions for summary judgment on all or some of the claims.

Respectfully submitted,

By: /s/ Carolyn Carollo
CAROLYN CAROLLO

**ATTORNEY FOR DEFENDANT DANIEL
GILBERT FIELDS**

AGREED TO BY MARK ORTEGA

CERTIFICATE OF SERVICE

Pursuant to Rule 5 of the Federal Rules of Civil Procedure, the undersigned counsel for the Defendant Daniel Gilbert Fields certify that the foregoing document has been filed with the Court electronic case filing system and served upon all known parties by e-service, first class mail, facsimile and/or certified mail, return receipt requested on January 7, 2025.

Mark Anthony Ortega, *Pro Se*
P.O. Box 702099
San Antonio, Texas 78270

/s/ Carolyn Carollo
Carolyn Carollo